

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

VICKI ANN RAYBURN,

Plaintiff,

vs.

WADY INDUSTRIES, INC.

Defendant.

No. C07-1008

VERDICT FORM

QUESTION NUMBER 1: Did Rayburn prove by the greater weight or preponderance of the evidence her claim that Wady Industries retaliated against her for complaining about a hostile work environment based on sex or gender?

Answer "Yes" or "No"

ANSWER: _____

QUESTION NUMBER 2: Did Rayburn prove by the greater weight or preponderance of the evidence her claim that Wady Industries wrongfully discharged her in violation of public policy?

Answer "Yes" or "No"

ANSWER: _____

[If you answered "No" to both of the preceding questions, then do not answer any further questions.]

(CONTINUED...)

VERDICT FORM (Cont'd)

QUESTION NUMBER 3: State the amount of damages Rayburn sustained as a proximate result of Wady Industries' wrongful conduct.

- | | | |
|----|----------------------------|----------|
| 1. | Lost Past Earnings | \$ _____ |
| 2. | Emotional Distress Damages | \$ _____ |

[If you find in favor of Rayburn on one or more of her claims, but you find that her damages proximately caused by Wady Industries' wrongful conduct have no monetary value, then you must return a verdict on that claim for Rayburn in the nominal amount of One Dollar (\$1.00).]

If you answered "Yes" to Question Number 1, then answer Question Numbers 4 and 5, as indicated. If you answered "No" to Question Number 1, then do not answer Questions 4 or 5.

QUESTION NUMBER 4: With regard to Rayburn's claim of retaliation, do you find by a preponderance of clear, convincing and satisfactory evidence that Wady Industries acted with malice or reckless indifference for the rights of another?

Answer "Yes" or "No"

ANSWER: _____

[If your answer to Question Number 4 is "No," then do not answer Question Number 5.]

QUESTION NUMBER 5: What amount of punitive damages, if any, do you award?

\$ _____

If you answered "Yes" to Question Number 2, then answer Question Numbers 6, 7, and 8, as indicated. If you answered "No" to Question Number 2, then do not answer Questions 6, 7, or 8.

(CONTINUED...)

VERDICT FORM (Cont'd)

QUESTION NUMBER 6: With regard to Rayburn's claim of wrongful discharge in violation of public policy, do you find by a preponderance of clear, convincing and satisfactory evidence that Wady Industries acted with willful and wanton disregard for the rights of another?

Answer "Yes" or "No"

ANSWER: _____

[If your answer to Question Number 6 is "No," then do not answer Question Number 7 or 8.]

QUESTION NUMBER 7: What amount of punitive damages, if any, do you award?

\$ _____

[If your answer to Question Number 7 is "None," then do not answer Question Number 8.]

QUESTION NUMBER 8: Was the conduct of Wady Industries directed specifically at Rayburn?

Answer "Yes" or "No"

ANSWER: _____

DATED this ____ day of August, 2008.

FOREPERSON